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Subject: RRT VI 15-16 SEPT 2007 Update regarding Cotton Patch Bayou Release (IVO Pasadena, TX)

All RRT VI Members on DIST list above:
Please find attached below an update that covers the period of Saturday and Sunday 15 & 16 SEP this past weekend. Please note that EPA has the lead on this incident, and USCG has begun to draw down its involvement in the process.

V/r
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Below is the Sunday 16 September 2007 update for the Cotton Patch Bayou Release: Updated amount of wastewater requiring removal is now 9.5 million gallons. This relatively small reduction from yesterday, only 1.8 million gallons, is due to mechanical problems shutting the wastewater treatment plant down from 0200 to 1200. (Wastewater treatment plant, which discharges directly into Houston Ship Channel, remains the only authorized controlled release method.)

Although no longer discharging into Cotton Patch Bayou, pH and wildlife monitoring continues. pH treatment appears to have had impact. Pond, which was being used as source for wastewater release, has pH of 1.8 to 2.0. Cotton Patch Bayou's three post-treatment monitoring stations have pH readings ranging from 3.06 to 5.66. No additional environmental impacts have been noted. EPA is requesting Agrifos' plan for environmental remediation for vegetation along Cotton Patch Bayou.

pH readings in Houston Ship Channel range from 5.6 to 6.7, which is considered normal. Wastewater treatment plant adjusts pH before release. Additionally, as stated yesterday, finding concentrated plume from release in Ship Channel has become increasingly difficult due to vessel traffic churning plume, hastening dispersion.

EPA, TCEQ, and CG resources continue to be reduced, as we enter further into a monitoring stage. Agrifos will still have to present viable long term contingency plans.

Pictures can be found at

http://www.epaosc.net/site_profile.asp?site_id=3445

Below is the Saturday 15 September 2007 update at 1700L:

Good weather continues to help improve the situation. The amount of required discharge has reduced to 11.3 million gallons; this large reduction is due to continued discharge combined with an independent engineering resurvey and

readjustments to pond levels. The pond levels on the South Stack are now reduced enough that Agrifos has begun to build the outer wall higher - this process will also increase storage capacity over time and is imperative to solving the overall surge capacity needed.

EPA OSC ordered Agrifos to discontinue discharge from 10" line at 1400 because of overall improved conditions and extremely favorable five day weather forecast. With no direct discharge to Cotton Patch Bayou, monitoring the water will be reduced to the permitted Agrifos outfalls. The company will continue its efforts to maximize output through its wastewater treatment plant (up to 1.2 million a day); additional plant use and evaporation will use another 1.4 million. Total project "burn" rate is 2.6 million gallons/day. Agrifos continues to develop its plans for alternative treatment and disposal as well as emergency plans for notification and handling future weather emergencies. (NOTE: Remanufacturing of low grade fertilizer has been put on hold as logistics are still being worked out. This frees up the wastewater treatment plant for use as described above.)

The EPA is reducing their current staffing levels but will maintain a continual presence until the conditions to their CERCLA Order are met. Sector Houston-Galveston will also maintain presence and monitor the situation. EPA and CG FOSCs released the Gulf Strike Team at 1700 on 15 SEP.

Pictures can be found at:

http://www.epaosc.net/site_profile.asp?site_id=3445